

JAMES E. WHITMIRE, ESQ.  
Nevada Bar No. 6533  
[jwhitmire@santoronevada.com](mailto:jwhitmire@santoronevada.com)  
SANTORO WHITMIRE  
10100 W. Charleston Blvd., Suite 250  
Las Vegas, Nevada 89135  
Telephone: 702/948-8771  
Facsimile: 702/948-8773

*Attorney for Defendants Hachiman, LLC dba  
Palomino Club and Lacy's, Palomino Club, LLC  
dba Palomino Club, Lacy's LLC, Adam Gentile  
and Craig Parks*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED SPECIALTY INSURANCE  
COMPANY, a Delaware corporation,

Plaintiff,

vs.

HACHIMAN, LLC dba PALOMINO CLUB and  
LACY'S, a Nevada limited liability company;  
PALOMINO CLUB, LLC dba Palomino Club, a  
Nevada limited liability company; LACY'S LLC  
dba LACY'S, a Nevada limited liability  
company; ADAM GENTILE, an individual;  
CRAIG PARKS, an individual; DEREK  
FESOLAI, an individual; ALEXANDER  
POTASI, an individual; DOE INDIVIDUALS I  
through X, inclusive and ROE BUSINESS  
ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:16-cv-02784-APG-EJY

**STIPULATION AND ORDER  
EXTENDING THE TIME FOR  
DEFENDANTS TO FILE RESPONSE TO  
PLAINTIFF'S MOTION FOR FURTHER  
RELIEF OR, IN THE ALTERNATIVE, TO  
AMEND THE JUDGMENT**

**(First Request)**

United Specialty Insurance Company ("Plaintiff") and Hachiman, LLC dba Palomino Club and Lacy's, Palomino Club, LLC dba Palomino Club, Lacy's LLC, Adam Gentile, and Craig Parks ("Defendants") state the following:

1. Plaintiff United Specialty Insurance Company filed its Motion for Further Relief or, in the Alternative, to Amend the Judgment (ECF No. 79) ("Motion") on January 31, 2020.

2. The current deadline for Defendants to file their Response to the Motion is February 14, 2020.

3. A ten-day extension is sought to respond to the Motion in good faith and not for purposes of undue delay. An extension is sought given that counsel for Defendants' counsel is departing Las Vegas to attend to an out of state family matter involving his elderly parents in the Midwest, together with ancillary workload matters.

4. The parties agree that Defendants will have up to and including **February 24, 2020** to file a Response.

**IT IS SO AGREED AND STIPULATED:**

CHRISTIAN, KRAVITZ, DICHTER,  
JOHNSON & SLUGA, LLC

SANTORO WHITMIRE

/s/ L. Renee Green

Martin J. Kravitz, Esq.  
Nevada State Bar No. 83  
L. Renee Green, Esq.  
Nevada State Bar No. 12755  
8985 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
Phone: (702) 362-6666  
Fax: (702) 992-1000  
Email: mkravitz@ksjattorneys.com  
rgreen@ksjattorneys.com

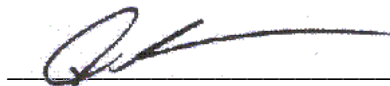
*Attorneys for Plaintiff*

/s/ James E. Whitmire

James E. Whitmire, Esq.  
Nevada State Bar No. 6533  
10100 W. Charleston Blvd., Suite 250  
Las Vegas, NV 89135  
Phone No.: (702) 948-8771  
E-mail: jwhitmire@santoronevada.com

*Attorney for Defendants Hachiman,  
LLC dba Palomino Club and Lacy's,  
PalominoClub, LLC dba Palomino  
Club, Lacy's LLC, Adam Gentile  
and Craig Parks*

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE  
Dated: February 12, 2020.